

LISA A. RASMUSSEN, Nevada Bar No. 7491
MCLEITCHIE LAW
602 South Tenth Street
Las Vegas, NV 89101
Telephone: (702) 728-5300; Facsimile: (702) 425-8220
Email: Lisa@nvlitigation.com; efile@nvlitigation.com
Attorney for Defendant JACQUES LANIER

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JACQUES LANIER,

Defendant.

Case No.: 2:19-CR-327 RFB-DJA

**MOTION TO APPOINT CO-
COUNSEL**

COMES NOW the Defendant, Jacques Lanier, by and through his counsel, Lisa Rasmussen, Esq. of the law firm McLetchie Law, and hereby respectfully asks the Court to appoint Karen Connolly as co-counsel in this matter. The nature and complexity of this case and the looming trial date are such that the interests of justice require appointment of co-counsel and Ms. Connolly is well suited to serve that role. Consistent with Nevada's CJA Plan and General Order 2021-01, the defense has obtained the required approval of the CJA Standing Committee and CJA Resource Counsel, and now seeks formal appointment of co-counsel.

This Motion is made and based upon Guide to Judicial Policies and Procedures, Vol 7, Ch 2 § 230.53.20(b), the attached memorandum of points and

1 authorities, the pleadings and papers on file herein, and any argument to be
2 entertained by the Court.

3 DATED this 5th of November, 2024

4 */s/ Lisa A. Rasmussen*

5 LISA A. RASMUSSEN, Nevada Bar No. 7491

6 **MCLETCHIE LAW**

7 *Attorney for Defendant Jacques Lanier*

8 **MEMORANDUM OF POINTS AND AUTHORITIES**

9 **A. BACKGROUND**

10 Jacques Lanier is charged with eight (8) counts of Coercion and Enticement
11 in violation of 18 USC §2422(b); four (4) counts of Sex Trafficking of Children in
12 violation of 18 USC §1591(a) and (b)(2); Tampering with a Witness in violation of
13 18 USC §1512(b); Travel with the Intent to Engage in Illicit Sexual Conduct in
14 violation of 18 USC §2423(b); Sexual Exploitation of Children in violation of 18
15 USC §2251(a); the Transfer of Obscene Material to a Minor in violation of 18 USC
16 §1470 and four (4) forfeiture allegations. ECF 243, Superseding Indictment. The
17 punishments for the Coercion and Enticement counts are mandatory minimum
18 ten years each count. The punishment for the sex trafficking of children are
19 mandatory minimums of ten years each count. The punishment for tampering
20 with a witness is up to 20 years. The punishment for traveling with the intent to
21 engage in illicit sexual activity is up to 30 years. The punishment for transferring
22 obscene material to a minor is up to ten years. The punishment for the sexual
23 exploitation of children is either a mandatory minimum of 15 years or 25 years
24 depending on Mr. Lanier's prior convictions. Mr. Lanier is 55 years old; he is not
25 a zero-criminal history offender and he faces potential life imprisonment.

26 Last week, the Court granted Mr. Lanier's Motion to Withdraw his Plea,
27 and this matter is set for trial on January 13, 2025. ECF 354, 355.
28

B. APPOINTMENT OF CO-COUNSEL

This case warrants the appointment of co-counsel because it is extremely difficult and complex. There are numerous named victims, there is substantial electronic discovery as well as telephone download data. There have historically been two counsels appointed to represent Mr. Lanier in this matter.

Given the volume and complexity of the discovery and the legal issues presented, as well as a trial date in approximately three months, the appointment of co-counsel is warranted in this case. The undersigned has conferred with CJA Resource Counsel, who recommends appointment of co-counsel. Additionally, consistent with Nevada's CJA Plan and General Order 2021-01, the defense has obtained the required approval of the CJA Standing Committee.

The defense's preferred co-counsel, Karen Connolly, has been practicing law for over 30 years and she is currently a member of the CJA Panel for this District. Ms. Connolly has assisted the undersigned as co-counsel in other cases, including cases in this District. Ms. Connolly is available to serve as co-counsel in this matter.

For each of these reasons, it is respectfully requested that the Court enter an order approving Karen Connolly as co-counsel in this matter.

DATED this 5th of November, 2024

/s/ Lisa A. Rasmussen

LISA A. RASMUSSEN, Nevada Bar No. 7491

MCLETCHE LAW

Attorney for Defendant Jacques Lanier

IT IS SO ORDERED:



RICHARD F. BOULWARE, II

United States District Judge

11/6/2024